



DECISION MEMO
LINVILLE SOUTH END TRAILS PROJECT – PHASE 1
U.S. FOREST SERVICE
GRANDFATHER RANGER DISTRICT, PISGAH NATIONAL FOREST
BURKE COUNTY, NORTH CAROLINA

The goal of this project is to improve the trail system in the south end of Linville Gorge. Approximately 4.4 miles of trail relocations are proposed to reduce resource damage, improve user experience, and increase maintainability of the trail system. Approximately 1.5 miles of new trails are proposed to provide access to rock climbing areas and overlooks while mitigating impacts to threatened and endangered plant species. This project is located in Burke County, North Carolina, with proposed activities both inside and outside the Congressionally designated Linville Gorge Wilderness Area. The north end of Linville Gorge is not included in this decision.

The project will be implemented in two phases. This decision approves the actions listed in phase 1 of the proposed action. Phase 2 of the project will be addressed in a subsequent decision.

BACKGROUND

This project is the result of a collaborative process reflecting long term needs and involvement from partner organizations, local government agencies, and community members.

In 2012 the National Forests in North Carolina began a public involvement effort to better understand trail needs, resulting in the Trails Strategy in 2013. The purpose of that document was to provide recommendations for the sustainable management of nonmotorized trails across the Nantahala and Pisgah National Forests of North Carolina. The strategy identified issues to address within the Linville Gorge area trails complex in order to provide sustainable trail experiences into the future.

In 2014 the Grandfather Ranger District began to engage the partners and the community of users and volunteers in the Linville Gorge area in an effort to improve maintenance of the current trail system. Over the next 3 years an amazing amount of volunteer efforts went into maintaining those trails, resulting in nearly full maintenance of all routes. Through these maintenance efforts, work began to formally assess needs for changes to the current trail systems in and around the Wilderness. Since 2017, approximately 80% of trails in the project area have been maintained to meet National Quality Standards. The remaining 20% will be addressed within this project.

In 2016 local non-profit partner organization Wild South engaged the community to gather feedback on the social and economic sustainability of the trail system in Linville Gorge. Based on this community input an initial needs assessment was submitted to the Grandfather Ranger District. Building on this initial assessment, the US Forest Service convened a group of partner

organizations representing the local community of users, wilderness stewardship organizations, rock climbing groups, and local government organizations to further refine the needs and actions reflected in this decision. This group of key partners included Wild South, Southern Appalachian Wilderness Stewards, Friends of the Mountains to Sea Trail, the Carolina Climbers Coalition, and Burke County Search and Rescue. Partners and community members were not only engaged in planning discussions, but also in trail layout and flagging. In October 2017 a formal scoping letter was sent out for public comment. Environmental review of the project began in 2018.

PURPOSE AND NEED

There is a need to increase the sustainability of the trail system for the Linville Gorge.

- There is a need to improve the ecological sustainability of the trail system to reduce resource damage and increase the ability for the Forest Service, volunteer, and partner organizations to maintain trails.
- There is a need to provide recreational backpacking loop opportunities within the Linville Gorge by connecting key trails, reducing social-trailing and trespass on private property.
- There is a need to provide sustainable access for rock climbers to key areas where climbing activity and rare plants co-occur.

The purpose and need for this project was developed to maintain or improve Wilderness character by balancing the qualities of natural, undeveloped, and opportunities for solitude and unconfined recreation.

PROPOSED ACTION

This proposed action addresses multiple actions to increase the sustainability of the trail system in Linville Gorge, both inside and outside the designated Wilderness Area. Please refer to the attached maps for detailed locations of each action.

PHASE 1 – APPROVED IN THIS DECISION

- Linville Gorge Trail Relocation (Leadmine extension)
- Shortoff Trail Relocations at Chimney Gap and Wolfpit
- Mountains to Sea Trail Relocations east of Pinnacle
- Table Rock Climbing Access Trail
- Devils Cellar Trail

PHASE 2 – ADDRESSED IN SUBSEQUENT DECISION

- Rock Jack Trail Relocation to meet Pinch-In
- Pinch-In Trail Relocations
- Table Rock Gap Trail Relocation
- Little Table Rock Trail Relocation and Decommission
- Amphitheater Climbing Access Trail

The following relocations will be implemented to reduce trail damage, improve the user experience, lessen the signs of trail development on Wilderness character, and increase maintainability of the trail system.

- **Included in Phase 1** - Relocate the south end of the Linville Gorge Trail (TR231) for 1.2 miles on the west side of the river in the Leadmine area to meet the Mountains to Sea Trail.
- **Included in Phase 1** - Relocate a section of the Shortoff Trail (TR235) for 0.2 miles between the Wolf Pit trailhead and the intersection with the Mountains to Sea Trail.
- **Included in Phase 1** - Relocate sections of the Shortoff Trail (TR235/TR440) on both sides of Chimney Gap for a total of 0.5 miles.
- **Included in Phase 1** - Relocate small sections of the Mountain to Sea Trail (TR440) east of Pinnacle for a total of 0.1 miles.
- **Included in Phase 2** - Relocate the south end of the Rock Jock Trail (TR247) for 0.7 miles along the western rim to join the Pinch-In Trail.
- **Included in Phase 2** - Relocate the upper (west) end of the Pinch-In Trail (TR228) for 0.8 miles and a section on the lower (east) end for 0.5 miles.
- **Included in Phase 2** - Relocate a section of the Table Rock Gap Trail (TR243/TR440) for 0.4 miles.
- **Included in Phase 2** - Relocate the Little Table Rock Trail (TR236) for 0.1 miles to begin at the Table Rock Summit trail and end at the Little Table Rock overlook. The remainder of the Little Table Rock Trail will be removed from the Forest Service trail system.

The Following new trails will be constructed to provide access to long-standing historic and popular rock climbing areas while mitigating impacts to threatened and endangered plant species.

- **Included in Phase 1** - Table Rock Climbing Access Trail will begin at the Table Rock Summit trail north of the Table Rock parking area and end at the Table Rock Gap Trail north of Table Rock, wrapping around the base for a total of 0.6 miles.
- **Included in Phase 2** - Amphitheater Climbing Access Trail will begin at the Mountains to Sea Trail in the Chimney's area and end at the Amphitheater Rim Trail. The Amphitheater Rim Trail will follow the contours of the Amphitheater formation between the Prow and the Mummy. Total trail length is 0.8 miles.

The following new trail will be implemented to provide sustainable access to popular overlooks as part of the Table Rock Summit Trail system.

- **Included in Phase 1** - Devils Cellar Trail for 0.1 miles from the Table Rock Summit Trail to the Devils Cellar overlook.

The following project design features are included in the proposed action to avoid or mitigate negative impacts of this decision:

1. Avoid clearing trees with exfoliating bark/crevices/cavities or snags in the early stages of decay to minimize the risk of disturbing roosting bats and to protect suitable bat roosting habitat. If removal of suitable bat trees is necessary, do not fell trees during the bat active season from April 15 - October 15.
2. No trees >3-inches dbh should be removed during the non-volant pup period of June 1 - July 31, but preferably during the bat active season from April 15 - October 15.
3. In addition, no trees >3-inches dbh should be removed within five miles of hibernacula from April 1 - May 15 for spring staging and Aug. 15 - Nov. 15 for fall swarming. This includes new trail construction from Table Rock Gap south to Rock Jock.
4. If project implementation occurs during the spring or summer, avoid clearing trees or shrubs with visible nests or cavities to minimize the risk of disturbing breeding birds. Avoid disturbing bird nests that occur on the ground if found during implementation.
5. Implementation of the proposed climber access at Amphitheater Rim will occur outside the peregrine nesting season of January 15 - August 15.
6. As discussed during site visits, new trail construction that passes Rhubarb Point should be designed with the goal of not directing people to Rhubarb Point inadvertently.
7. If Carolina Hemlock or Large Witch-alder are encountered in new trail construction an attempt should be made to avoid harm to these plants if possible.
8. Treat high-priority invasive species when found before, during, and after project implementation with coordination of botanist.

Mitigation measures for this project include:

- A botanist from either USFWS or USFS will be on site during construction of the Amphitheater Climbing Access Trail to ensure that no encroachment occurs on the Mountain Golden-heather or Heller's Blazing Star populations and that adequate buffers are maintained if trail realignment must occur.
- USFS will conduct annual monitoring of nearby populations of Mountain Golden Heather and Heller's Blazing Star in the Amphitheater Rim Trail area for 5 years post-project implementation to determine if new traffic patterns or invasive species are creating unexpected negative effects. A report will be submitted to USFWS with findings each year.

DECISION

It is my decision to proceed with phase 1 of the proposed action as it will result in establishing an ecologically and socially sustainable trail system, reduce degradation of resources, and improve Wilderness character.

This action is categorically excluded from documentation in an environmental impact statement (EIS) or an environmental assessment (EA). The applicable category of actions is identified in

agency procedures as under categorical exclusion 36 CFR 220.6 (e) (1) (Construction or reconstruction of trails).

I find that there are no extraordinary circumstances that would warrant further analysis and documentation in an EA or EIS. I took into account resource conditions identified in agency procedures that should be considered in determining whether extraordinary circumstances might exist:

- Federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, or Forest Service sensitive species – Based on the findings contained in the biological evaluation, the Linville South end Trails Project:
 - would not affect any federally proposed, threatened, endangered, Region 8 Sensitive, or Forest Concern aquatic species because species or habitat are not known to occur within the proposed activity or analysis area. Consultation with the U.S. Fish and Wildlife Service is not required for aquatic resources.
 - may affect, but is not likely to adversely affect the northern long-eared bat. Consultation with the U.S. Fish and Wildlife Service is not required for northern long-eared bat for this project; however, the 4(d) rule requires the Forest Service to notify the U.S. Fish and Wildlife Service of the proposed action 30 days prior to implementation.
 - may affect, but is not likely to adversely affect Mountain Golden-heather and its designated Critical Habitat or Heller's Blazing Star. Informal consultation with U.S. Fish & Wildlife Service was sought in June 2020, and U.S. Fish & Wildlife Service concurs.
 - may impact individuals of Large Witch-alder but is not likely to cause a trend to federal listing or a loss of viability either locally or forest-wide.
- Flood plains, wetlands, or municipal watersheds – None are present.
- Congressionally designated areas such as wilderness, wilderness study areas, or national recreation areas – The project area falls within the Congressionally designated Linville Gorge Wilderness Area. In addition to consideration of Wilderness character in the purpose and need, impacts to Wilderness character were considered for all actions, particularly around tradeoffs between the developed and natural characters and between opportunities for solitude and unconfined recreation. New trail construction in the wilderness is offset by naturalizing user created trails and removing trail miles from the system. No prohibited actions will take place in implementation of this project within the Wilderness boundary.
- Inventoried roadless areas or potential wilderness areas – northern most sections of relocations of the Shortoff Trail (TR235/TR440) fall within the Linville Addition Inventoried Roadless area. The proposed actions are consistent with roadless management and do not impact roadless character.
- Research natural areas – None are present.

- American Indians and Alaska Native religious or cultural sites – Tribal consultation and project specific comments have not resulted in the identification of religious or sacred sites or traditional cultural properties. The Phase 1 proposed trail project tasks are considered an Exempt Undertaking (EU) for further archaeological and Heritage Resources review. Exempt criteria follow project tasks along with recommended mitigations where pertinent. Tribal Consultation for Phase 2 proposals will be ongoing through standard Forest Service and Native American Tribal processes.
- Archaeological sites, or historic properties or areas – All Phase 1 proposed trail project tasks were field reconned for programmatic agreement and Tribal requirements, and are considered an Exempt Undertaking (EU) for Heritage Resources. Exempt criteria follow project tasks along with recommended mitigations where pertinent. These actions are an EU under the current programmatic agreement. Standard cultural resource protection processes and documentation apply to all Phase 2 proposals.

PUBLIC INVOLVEMENT

A scoping letter was mailed to those who have expressed interest in projects on the Grandfather Ranger District, as well as local government officials, on October 24, 2017. A subsequent public meeting was held at the Linville Gorge Information Cabin on November 4, 2017. This action was originally listed as a proposal on the Pisgah National Forest Schedule of Proposed Actions on January 2, 2018 and updated periodically during the analysis.

Seven (7) comments were received from individuals and organizations. The majority of comments were in support of the project. Supportive comments, as to why the project should move forward, included:

- General support of trail relocations to improve sustainability.
- The importance of the connection of the Linville Gorge Trail and the Mountains to Sea Trail and the extension of the Rock Jock Trail to the Pinch-In trail.
- Support of new trail construction.

Areas of consideration, in response to the scoping proposal, include the following topics. Responses are included to provide clarification

- Concern about the adoption of the social trail to the Amphitheater and potential negative effects to solitude.

Response: This proposal will construct a new, sustainable trail to the Amphitheater that will not follow an existing social trail. The current social trail already receives a high of use and is a source of damage to federally endangered plant species growing in the area. While the designation of a trail in this area may invite additional traffic, designating a trail allows for better management of visitation through this sensitive area. In project development, we considered alternative actions including closing the area to foot traffic, signage, and alternate locations. In weighing all alternatives, the proposed action in this decision had the least impact to the overall balance of Wilderness character and rare plant habitat.

- Concern about the removal of the majority of the Little Table Rock trail from the system as a connector from Table Rock to Spence Ridge.

Response: Improvements on the Table Rock Gap trail outlined in the purpose and need will improve that trail as a connection from Table Rock to Spence Ridge. That trail provides a more sustainable route to make the same connection with similar mileage. The current route of the Little Table Rock trail through that area is unsustainable and underutilized when compared to other trails in the area. Relocation of the entire Little Table Rock route would be duplicative where an alternate trail exists.

- Multiple comments provided other areas in the Linville Gorge Wilderness for new trail construction.

Response: It is our goal to limit new trail construction within the Congressionally designated Wilderness area to places where natural or social consideration are so great that trail development is necessary to preserve Wilderness character. While, there are many destinations in the area, the new trails outlined in this decision were the only locations identified with critical needs to protect natural resources, maintain recreational access, and preserve wilderness character.

FINDINGS REQUIRED BY OTHER LAWS AND REGULATIONS

This decision is consistent with the Pisgah National Forest Land Management Plan. The project was designed in conformance with management areas 7, 4C, and 3B.

ADMINISTRATIVE REVIEW (APPEAL) OPPORTUNITIES

This decision is not subject to administrative review and appeal.

CONTACT

For additional information concerning this decision, contact: Lisa Jennings, Recreation Manager, Grandfather Ranger District, Pisgah National Forest, 109 East Lawing Drive, Nebo, NC 28761, lisa.n.jennings@usda.gov, 828-337-1359.



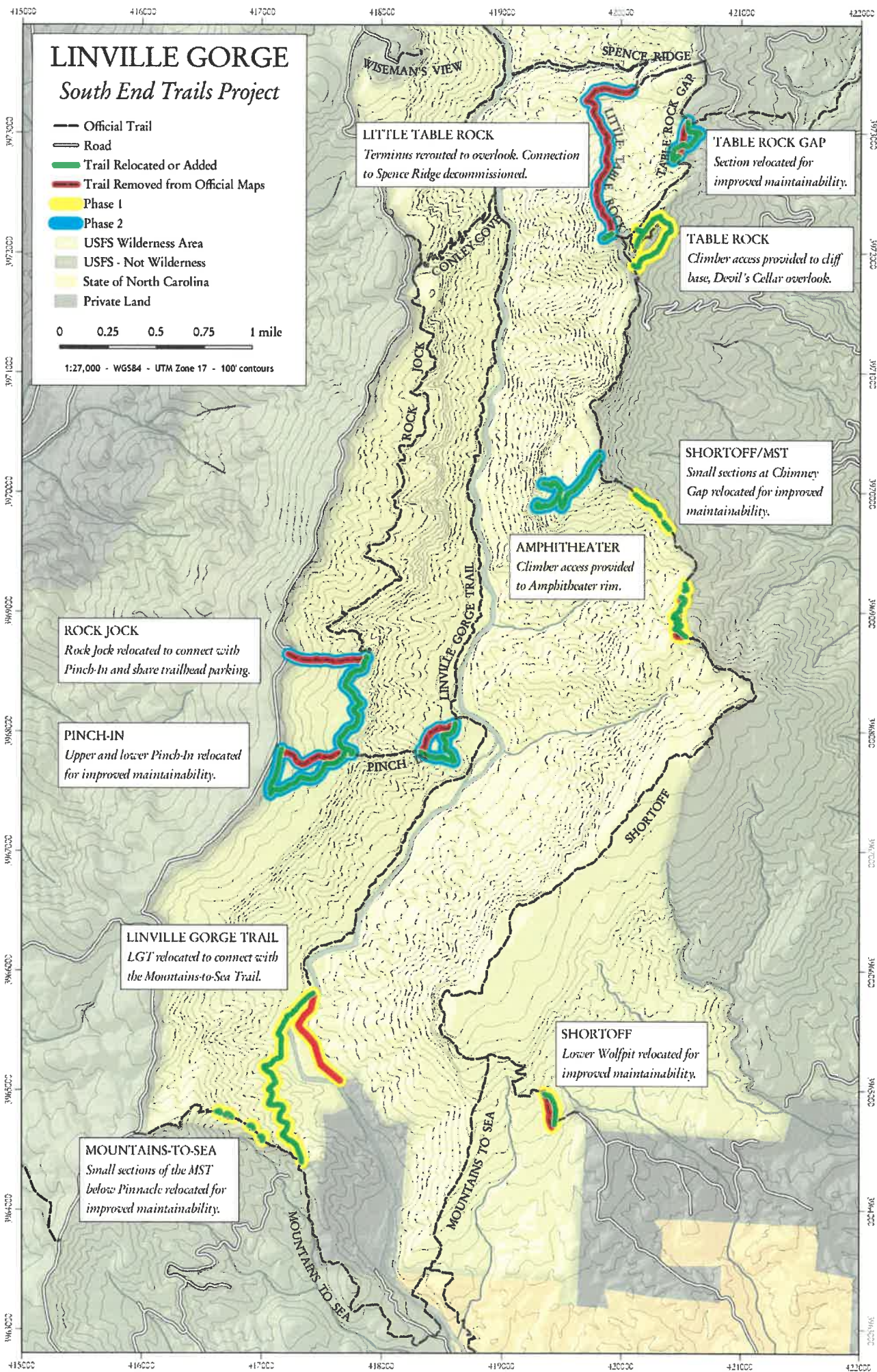
Nicholas Larson

DISTRICT RANGER

9/16/2020

Date

The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or because all or part of an individual's income is derived from any public assistance program. (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at (202) 720-2600 (voice and TDD). To file a complaint of discrimination, write to USDA, Director, Office of Civil Rights, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, or call (800) 795-3272 (voice) or (202) 720-6382 (TDD). USDA is an equal opportunity provider and employer.



LINVILLE GORGE

South End Trails Project

- Official Trail
- Road
- Trail Relocated or Added
- Trail Removed from Official Maps
- Phase 1
- Phase 2
- USFS Wilderness Area
- USFS - Not Wilderness
- State of North Carolina
- Private Land

0 0.25 0.5 0.75 1 mile

1:27,000 - WGS84 - UTM Zone 17 - 100' contours

LITTLE TABLE ROCK

Terminus rerouted to overlook. Connection to Spence Ridge decommissioned.

SPENCE RIDGE

TABLE ROCK GAP

Section relocated for improved maintainability.

TABLE ROCK

Climber access provided to cliff base, Devil's Cellar overlook.

SHORTOFF/MST

Small sections at Chimney Gap relocated for improved maintainability.

AMPHITHEATER

Climber access provided to Amphitheater rim.

ROCK JOCK

Rock Jock relocated to connect with Pinch-In and share trailhead parking.

PINCH-IN

Upper and lower Pinch-In relocated for improved maintainability.

LINVILLE GORGE TRAIL

LGT relocated to connect with the Mountains-to-Sea Trail.

MOUNTAINS-TO-SEA

Small sections of the MST below Pinnacle relocated for improved maintainability.

SHORTOFF

Lower Wolfpit relocated for improved maintainability.

